

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

RECEIVED

MAR 10 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re:

Redevelopment of Spectrum to
Encourage Innovation in the
Use of New Telecommunications
Technologies

ET Docket No. 92-9 ✓

RM-7981
RM-8004

Further Comments of Hughes Communications Galaxy, Inc.

Hughes Communications Galaxy, Inc. ("HCG") hereby submits these Further Comments in response to the Reply Comments of Alcatel Network Systems, Inc. ("Alcatel") filed on January 26, 1993 in this proceeding.

In its Reply Comments, Alcatel proposed a new channelization scheme for the 4 GHz band that Alcatel contended would entirely resolve the concerns of the satellite industry. On February 8, 1993, pursuant to Section 1.415 of the Commission's rules, HCG and certain other members of the satellite industry requested that the Commission grant them leave until March 10, 1993 to file further comments. These Further Comments of HCG are filed pursuant to that request.

Throughout this proceeding, HCG has expressed concern about the disruption to the C band satellite industry that would result from the adoption of the Commission's proposal to rechannelize portions of the 4 GHz band and allow displaced 2 GHz microwave users to use that band. In particular, HCG explained that the 4 GHz band channelization plan originally suggested by

No. of Copies rec'd
List A B C D E

049

4

Alcatel, and ultimately proposed by the Commission, would create increased terrestrial interference into satellite communications.

In response to these concerns and the concerns of others, Alcatel has proposed an alternate channelization scheme that would maintain the frequency "offset" that currently exists between terrestrial and satellite uses of the 4 GHz band. HCG appreciates Alcatel's efforts to develop this alternate proposal. Assuming the Commission determines that it is necessary to open the 4 GHz band to displaced microwave users, HCG does not object to Alcatel's new channelization plan and believes that this new proposal is preferable to the plan the Commission has proposed.

HCG remains concerned, however, that use of the 4 GHz band is not the best solution for relocating displaced microwave users. It is clear from the record in this proceeding that the 4 GHz band already is congested and that use of that band by additional users (regardless of the channelization method used) will present coordination challenges for all users of the band. Alcatel has acknowledged that the 4 GHz band is not the best solution to its problems and has urged the Commission to make available alternate spectrum for displaced microwave users, such as the 3.6-3.7 GHz band.¹ HCG supports these proposals to find

¹ See, e.g., Reply Comments of Alcatel at 5 (Technical Staff) ("Due to the known satellite coordination problems in the 3.7-4.2 GHz band, we believe that use of the 3.7-4.2 GHz band among narrow band users would drop to near zero if the adjacent 3.6-3.7 GHz band were made available.") See also Reply Comments of HCG at 2 (noting that concerns about further use of the already congested 4 GHz band have been expressed by National Spectrum Managers Association, the Telecommunications Industry Association, Northern Telecom, Harris Corporation-Farion Division, Digital Microwave Corporation, Telesciences, Inc. and Comsearch).

spectrum in bands other than 4 GHz and urges the Commission to continue to review alternatives, such as the 3.6-3.7 GHz band.

Respectfully submitted,

HUGHES COMMUNICATIONS GALAXY, INC.

By: 

John P. Janka

LATHAM & WATKINS

1001 Pennsylvania Ave., N.W.

Suite 1300

Washington, D.C. 20004

(202) 637-2200

March 10, 1993

CERTIFICATE OF SERVICE

I, John P. Janka, do hereby certify that the attached
Further Comments of Hughes Communications, Inc. was mailed,
postage prepaid, this 10th day of March, 1993, to the following:

Robert J. Miller
Gardere & Wynne, L.L.P.
A Registered Limited Liability Partnership
1601 Elm Street, Suite 3000
Dallas, Texas 75201

Alexander P. Humphrey
GE American Communications, Inc.
1331 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Terry C. Natoli
GTE Spacenet Corporation
1700 Old Meadow Road
McLean, Virginia 22102

Benjamin J. Griffin
Reed, Smith, Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Theodore A. Miles
National Public Radio, Inc.
2025 M Street, N.W.
Washington, D.C. 20004

Andrew R. Paul
SBCA
225 Reinekers Lane
Suite 600
Alexandria, Virginia 22314



John P. Janka